

BOIES SCHILLER & FLEXNER LLP
OAKLAND, CALIFORNIA

1 WILLIAM A. ISAACSON (Admitted *Pro Hac Vice*)
(wisaacson@bsflp.com)

2 BOIES, SCHILLER & FLEXNER LLP
3 5301 Wisconsin Ave, NW, Washington, DC 20015
Telephone: (202) 237-2727; Fax: (202) 237-6131

4 JOHN F. COVE, JR. #212213
(jcove@bsflp.com)
5 BOIES, SCHILLER & FLEXNER LLP
6 1999 Harrison Street, Suite 900, Oakland, CA 94612
7 Telephone: (510) 874-1000; Fax: (510) 874-1460

8 RICHARD J. POCKER #114441
(rpocker@bsflp.com)
9 BOIES, SCHILLER & FLEXNER LLP
10 300 South Fourth Street, Suite 800, Las Vegas, NV 89101
Telephone: (702) 382 7300; Fax: (702) 382 2755

11 DONALD J. CAMPBELL (Admitted *Pro Hac Vice*)
(djc@campbellandwilliams.com)
12 J. COLBY WILLIAMS (Admitted *Pro Hac Vice*)
(jcw@campbellandwilliams.com)
13 CAMPBELL & WILLIAMS
14 700 South 7th Street, Las Vegas, Nevada 89101
15 Telephone: (702) 382-5222; Fax: (702) 382-0540

16 *Attorneys for Defendant* Zuffa, LLC, d/b/a
17 Ultimate Fighting Championship and UFC

18 UNITED STATES DISTRICT COURT

19 NORTHERN DISTRICT OF CALIFORNIA - SAN JOSE DIVISION

20 Cung Le, Nathan Quarry, Jon Fitch, on behalf
21 of themselves and all others similarly situated,

Case No. 5:14-cv-05484 EJD

22 Plaintiffs,

**STIPULATION AND [PROPOSED]
ORDER STAYING DISCOVERY
PENDING RESOLUTION OF THE
MOTION TO TRANSFER**

v.

23 Zuffa, LLC, d/b/a Ultimate Fighting
24 Championship and UFC,

25 Defendant.

26

27

28

1 Luis Javier Vazquez and Dennis Lloyd
2 Hallman, on behalf of themselves and all
3 others similarly situated,

4 Plaintiffs,

5 v.

6 Zuffa, LLC, d/b/a Ultimate Fighting
7 Championship and UFC,

8 Defendant.

Case No. 5:14-cv-05591 EJD

9 Brandon Vera and Pablo Garza, on behalf of
10 themselves and all others similarly situated,

11 Plaintiffs,

12 v.

13 Zuffa, LLC, d/b/a Ultimate Fighting
14 Championship and UFC,

15 Defendant.

Case No. 5:14-cv-05621 EJD

16 Gabe Ruediger and Mac Danzig, on behalf of
17 themselves and all others similarly situated,

18 Plaintiffs,

19 v.

20 Zuffa, LLC, d/b/a Ultimate Fighting
21 Championship and UFC,

22 Defendant.

Case No. 5:15-cv-00521 EJD

23

24

25

26

27

28

1 Kyle Kingsbury and Darren Uyenoyama, on
2 behalf of themselves and all others similarly
3 situated,

Case No. 5:15-cv-01324 EJD

3 Plaintiffs,

4 v.

5 Zuffa, LLC, d/b/a Ultimate Fighting
6 Championship and UFC,

7 Defendant.

B O I E S , S C H I L L E R & F L E X N E R L L P
O F C A K L A N D , C A L I F O R N I A

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

1 Plaintiffs Cung Le, Nathan Quarry, Jon Fitch, Luis Javier Vazquez, Dennis Lloyd
 2 Hallman, Brandon Vera, Pablo Garza, Gabe Ruediger, Mac Danzig, Kyle Kingsbury, and Darren
 3 Uyenoyama (collectively, "Plaintiffs") and Defendant Zuffa, LLC d/b/a Ultimate Fighting
 4 Championship and UFC ("Zuffa"), request that the Court enter the parties' stipulation below
 5 staying discovery pending the resolution of the Motion to Transfer.

6 WHEREAS Defendant Zuffa has filed a Motion to Dismiss and a Motion to Transfer
 7 Venue Under 28 U.S.C. § 1404(a) in the above-entitled matters (*Le* Dkt. 31; Dkt. 64);

8 WHEREAS Plaintiffs have opposed those motions (*Le* Dkt. 69; Dkt. 71);

9 WHEREAS the Motion to Transfer venue is fully briefed and was argued and submitted
 10 on May 7, 2015;

11 WHEREAS the Motion to Dismiss is fully briefed and is scheduled for argument on July
 12 23, 2015;

13 WHEREAS the Defendant has moved to stay discovery pending the resolution of the
 14 Motions to Transfer and Dismiss (*Le* Dkt. 87);

15 WHEREAS the Plaintiffs intend to oppose the Motion to Stay Discovery to the extent that
 16 it would stay discovery pending resolution of the Motion to Dismiss;

17 WHEREAS the parties wish to conserve their own and judicial resources in resolving
 18 these issues;

19 THE PARTIES STIPULATE AND AGREE AS FOLLOWS:

- 20 1. Discovery will be stayed pending the resolution of the pending Motion to Transfer;
- 21 2. Defendant's Motion to Stay Discovery will be held in abeyance pending resolution of the
 Motion to Transfer;
- 22 3. Once the Motion to Transfer is resolved, Plaintiffs may respond to the pending Motion to
 Stay no later than 30 days after the Court's order on the Motion to Transfer and Zuffa will
 file its Reply no later than 14 days after Plaintiffs file their response;
- 23 4. If the action is transferred to the District of Nevada, the parties will rely on their existing
 briefing on the Motion to Dismiss, rather than re-briefing the Motion, subject to
 compliance with the District of Nevada's Local Rules and, to the extent required, approval

1 of the Court in the transferee District. Nothing in this paragraph shall prevent either party
2 from providing notices of supplemental authority or similar additional material to the
3 Court to the extent permitted under the Federal Rules or any applicable Local Rule if
4 circumstances warrant.

5
6
7 Dated: May 29, 2015

/s/ John F. Cove, Jr.

John F. Cove, Jr.
BOIES, SCHILLER & FLEXNER LLP
Counsel for Defendant Zuffa, LLC

8
9
10 Dated: May 29, 2015

/s/ Matthew S. Weiler

Joseph R. Saveri
Matthew S. Weiler
JOSEPH SAVERI LAW FIRM, INC.
Counsel for Plaintiffs

11
12
13 Pursuant to Local Rule 5.1(i)(3) I attest that all other signatories listed, and on whose behalf the
14 filing is submitted concur in the filing's content and have authorized the filing.

15
16 Dated: May 29, 2015

By: /s/ John F. Cove, Jr.

John F. Cove, Jr.

1 **[PROPOSED] ORDER**
2

3 PURSUANT TO STIPULATION, IT IS SO ORDERED.
4

5 Dated: 6/1/2015, 2015
6

7 
8 Honorable Edward J. Davila
9 United States District Judge
10

11 B O I E S , S C H I L L E R & F L E X N E R L L P
12 O A K L A N D , C A L I F O R N I A
13

14
15
16
17
18
19
20
21
22
23
24
25
26
27
28